

	X
	:
In re:	:
	:
THE FINANCIAL OVERSIGHT AND	: PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	: Title III
	:
as representative of	: Case No. 17-BK-4780 (LTS)
	:
PUERTO RICO ELECTRIC POWER AUTHORITY	: <b>This filing relates only to</b>
	: <b>Case No. 17-BK-4780 (LTS)</b>
	:
Debtor.	:
	X

The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States Magistrate Judge Judith Gail Dein:

The Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding Procedures July 30, 2019 Hearing* [Case No. 17-3283, Docket No. 7921; Case No. 17-4780, Docket No. 1454] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins, Nicholas A. Bassett and Zachary S. Zwillinger of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in Courtroom 8 of the United States District Court for the District of Massachusetts, One Courthouse Way, Boston, Massachusetts, and address, as necessary, the following matters:

- (a) *Official Committee of Unsecured Creditors’ Omnibus Motion to Compel Production of Documents in Connection With PREPA RSA Rule 9019 Settlement Motion* [Case No. 17-3283, Docket No. 7204; Case No. 17-4780, Docket No. 1269];
  - (i) *Omnibus Reply in Support of Official Committee of Unsecured Creditors’ Omnibus Motion to Compel Production of Documents in Connection With PREPA RSA Rule 9019 Settlement Motion* [Case No. 17-3283, Docket No. 7355 ; Case No. 17-4780, Docket No. 1318];
- (b) *Renewal of June 3, 2019 Omnibus Motion of Official Committee of Unsecured Creditors to Compel in Connection With PREPA RSA Rule 9019 Settlement Motion* [Case No. 17-3283, Docket No. 8263; Case No. 17-4780, Docket No. 1517];

- (i) *Omnibus Reply of Official Committee of Unsecured Creditors in Support of Renewed Omnibus Motion to Compel Discovery in Connection With PREPA RSA Rule 9019 Settlement Motion* [Case No. 17-3283, Docket No. 8269; Case No. 17-4780, Docket No. 1520];
- (c) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities* [Case No.18-3283, Docket No. 7507];
  - (i) *Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion Regarding Pension Liabilities Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7507]* [Case No. 17-3283, Docket No. 7880];
- (d) *Ambac Assurance Corporation's Motion to Compel Compliance With The Court's December 15, 2017 and February 26, 2018 Orders Regarding The Urgent Renewed Joint Motion of The Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., The Mutual Fund Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination* [Docket No. 17-3283, Docket No.7505];
  - (i) *Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion to Compel Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7505]* [Case No. 17-3283, Docket No. 7883];
- (e) Any objections, responses, statements, joinders, or replies to any of the foregoing pleading; and

- (f) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing in San Juan, Puerto Rico.

*[Remainder of page intentionally left blank.]*

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: July 26, 2019

/s/ Luc A. Despins

PAUL HASTINGS LLP  
Luc. A. Despins, Esq. (Pro Hac Vice)  
James R. Bliss, Esq. (Pro Hac Vice)  
Nicholas A. Bassett, Esq. (Pro Hac Vice)  
G. Alexander Bongartz, Esq. (Pro Hac Vice)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
lucdespins@paulhastings.com  
jamesbliss@paulhastings.com  
nicholasbassett@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured Creditors*

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC  
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)  
Alberto J. E. Añeses Negrón, Esq. (USDC - PR 302710)  
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)  
Juan C. Nieves González, Esq. (USDC - PR 231707)  
Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)  
PO Box 195075  
San Juan, PR 00919-5075  
Tel.: (787) 523-3434 Fax: (787) 523-3433  
jcasillas@cstlawpr.com  
aaneses@cstlawpr.com  
ifernandez@cstlawpr.com  
jnieves@cstlawpr.com  
cfernandez@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured Creditors*